California Regional Water Quality Control Board
Lahontan Region

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Arnold Schwarzenegger
Governor

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Mary M. Miller
Recreation and Environmental Studies
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COMMENTS DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED TECHACHAPI EAST AFTERBAY PROJECT, STATE CLEARING HOUSE NO. 2004061133, KERN AND LOS ANGELES COUNTYS

California Regional Water Quality Control Board (Board) staff has reviewed the draft environmental impact report (DEIR) for the project, date September 2004 and received on September 28, 2004, and has the following comments.

Project Description

It is our understanding that the Project consists of ten principle features. Those features include: (1) inlet channel; (2) isolation weir; (3) reservoir; (4) flow barrier; (5) permanent spoil piles; (6) outlet channel; (7) bypass; (8) existing channel improvements; (9) drainage culvert; and (10) control building. The purpose of the project is to provide additional storage capacity to the existing afterbay. The additional gross storage would be approximately 1,159 acre-feet. The additional storage covers about 71 acres at the normal maximum water level.

Comments

The proposed erosion control best management practices (BMPs) for the proposed afterbay project need to be expanded to address both temporary and permanent drainage pattern modifications. The permanent spoils piles need to have BMPs that would protect the surrounding surface area from erosion and channeling of runoff water. There should be no down cutting of any channels at the base of the spoils piles. Stormwater should sheet flow down the slopes and not be concentrated or channeled at the base of the slopes. The piles and other disturbed areas should be contoured to maintain natural drainage to the extent possible. **8a**

The project includes fill and culvert construction for an ephemeral drainage channel at the site. Proposed fill areas should be minimized to the extent possible and culverts sized and constructed to maintain natural drainage patterns. The box culvert should not cause any upstream erosion of the natural drainage channel. The design of the box culvert should be such that the channel flow **8b**

is not concentrated causing channeling. The box culvert needs routine maintenance so that sediments will not accumulate within the box culvert, restricting flow. The culvert should be designed to maintain upstream and downstream contours and not limit wildlife use of the area. All disturbed areas should be revegetated to promote natural drainage and percolation. **8b cont.**

The EIR should address any potential impacts to water quality or wildlife from long-term operation of the afterbay such as from cleaning, maintenance or water treatment activities. **8c**

If you should have any questions, please contact me at (760) 241-7353 or Cindi Mitton at (760) 241-7413.

Sincerely,

Douglas E. Feay

Doug Feay R.G.
Engineering Geologist

cc: State Clearinghouse
Kern County Planning
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Lahontan Regional Water Quality Control Board

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8a Thank you for providing guidance on the specific temporary and permanent drainage pattern modifications that should be addressed through erosion control best management practices (BMPs). These will be incorporated, as appropriate, into the project design and construction practices to be implemented by the CDWR and its construction contractor during construction and operation of the proposed facilities. It should be noted that Section 2.5, Environmental Commitments, also lists erosion-minimizing measures that may be implemented, which include avoiding excessive disturbance of steep slopes; using drainage control structures (e.g., coir rolls or silt fences) to direct surface runoff away from disturbed areas and/or trapped sediments; strictly controlling vehicular traffic; implementing a dust-control program during construction; using vehicle mats in wet areas; and revegetating or reseeding disturbed areas following construction. These erosion-control measures shall be installed before extensive clearing and grading begins, and before the onset of winter rains.

Furthermore, a Storm Water Pollution Prevention Plan will be prepared for project construction in accordance with the requirements of the NPDES Construction General Permit, which will be available for review by the Lahontan Regional Water Quality Control Board (RWQCB). In addition, the Draft EIR indicates that the Lahontan RWQCB may need to issue General Waste Discharge Requirements for Small Construction Projects, which regulates dredging and minor stream alterations within surface waters of the State when 401 Water Quality Certification is not applicable.

8b The CDWR Division of Engineering has designed the culvert in a way that would maintain the natural drainage patterns without causing any upstream erosion of the natural drainage channel and will maintain upstream and downstream existing contours, except for a short distance downstream of the culvert where the channel will be slightly lowered to divert the discharge from the culvert. Additionally, the culvert will not limit wildlife use of the area.

8c Project operation and maintenance is discussed in Sections 2.4 of the Draft EIR, and biological issues associated with operation and maintenance are discussed in Section 3.2.4.2 of the Draft EIR. Below is a summary of information presented in the Draft EIR and Final EIR which addresses potential impacts to water quality or wildlife from operation and maintenance of the proposed Tehachapi East Afterbay.

Overall, operation of the proposed reservoir would be similar to operating a wide spot in the Tehachapi Afterbay (Pool 42). Therefore, operations and maintenance for the proposed project would generally be the same as for the existing Aqueduct facilities. Operation of the proposed project would have no effect on the quality of surface water. The growth of algae in the water would be prevented by the use of copper sulphate, as is currently done for water in the Aqueduct. The storage, handling, and application of pesticides for maintenance of the facility are actions routinely carried out at other CDWR facilities along the Aqueduct.

For silt cleaning activities (approximately every five to ten years), the CDWR advises the California Department of Fish and Game prior to sediment removal in the event that there are concerns about relocating fish. Sediment would be removed according to an established protocol consistent with other similar CDWR facilities. Sediment removed from the reservoir would be added to the spoil pile and/or

the potential supplemental spoil pile. The disturbed area would be revegetated consistent with mitigation measure BIO-1.

Finally, to limit accidental deaths of non-avian wildlife and reduce impacts to sensitive species to less-than-significant levels during operations, the proposed project area would be fenced, similar to the existing Aqueduct facilities.